IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA WESTERN DIVISION

NO.	5:	15.	CR-	14	1-

FILED
MAY 0.7 2015 JULE RICHARDS JOHNSTON, CLERK US DISTRICT COURT, EDNC DEP CLK
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UNITED STATES OF AMERICA)	•
)	
v.)	INFORMATION
)	
JOSEPH CHARLES MOORE,)	
a/k/a Issa Moore)	

The United States Attorney for the Eastern District of North Carolina charges:

COUNT ONE

- 1. On or about the 19 March 2014, defendant JOSEPH CHARLES MOORE, also known as "Issa Moore," did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations in a matter involving international terrorism within the jurisdiction of the executive branch of the Government of the United States, and which statements and representations were material to investigations in the Eastern District of North Carolina conducted by the Federal Bureau of Investigation.
- 2. Specifically, during an interview with agents of the Federal Bureau of Investigation in Fayette County, Kentucky, MOORE stated:
 - i. That he had never heard AVIN BROWN or AKBA JORDAN discussing violent jihad or traveling overseas to support jihad; and

- ii. That he had never engaged in any type of activity involving weapons with AKBA JORDAN nor had he seen firearms at Jordan's home.
- 3. These statements and representations were false because as MOORE then and there knew:
 - i. Between on or about 1 July 2013 and 19 March 2014, MOORE had participated in various conversations with AVIN BROWN and AKBA JORDAN in which BROWN and JORDAN expressed their desire to travel overseas to engage in violence, which they referred to as "jihad"; and
 - ii. On or about 3 October 2013, MOORE did travel to the home of JORDAN where MOORE observed multiple firearms and MOORE handled at least one of them.

All in violation of Title 18, United States Code, Section 1001(a)(2).

THOMAS G. WALKER United States Attorney

BY: JASON M. KELLHOFER

Assistant United States Attorney

Criminal Division